From: Rochlin, Kevin
Sent: Friday, September 13, 2013 12:48 PM
To: Barbara Ritchie
Cc: Rochlin, Kevin; Douglas.Tanner; Greutert, Ed [USA]; Kelly Wright; Scott Miller; Stifelman, Marc; susanh@ida.net; Zavala, Bernie
Subject: RE: FMC Hydrogeologic zone Study Work Plan comment

Categories: 11-19 to 1-10 2014

Barbara,

Attached are the Tribes comments on the Hydro Study. Please provide responses to them under the same schedule that you are addressing EPA's comments.

Kevin

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From: Kelly Wright [kwright@sbtribes.com]
Sent: Thursday, September 05, 2013 7:42 AM
To: Rochlin, Kevin
Cc: Jennings, Jannine; susanh@ida.net; Virginia Monsisco
Subject: FMC Hydrogeologic zone Study Work Plan comment

Good morning Kevin, please find the Shoshone Bannock Tribes comments on the FMC Hydrogeological Zone Study Work Plan. As stated below, the Tribes are requesting that we evaluate the groundwater model report that is referenced throughout this document.

General comment:
The Shoshone-Bannock Tribes would like to evaluate the groundwater model report referenced throughout this document specifically, the parameters selected for groundwater flow and contaminant transport models, assess the reasonableness of predicted parameters, gain a better understanding of sorption coefficients, dispersivity and porosity parameters.

During the Step Drawdown, all production wells at Simplot should have their pumping rates measured. All irrigation wells within a determined radius should be inventoried and identified for pumping rates.

Section 2.1.1
second bullet: migration of site related constituents from shallow groundwater to the deeper zone is inhibited by upward vertical hydraulic gradients of confining strata throughout large portions of the EMF study area.
Add: however, site related COCs have been measured in wells in the deep aquifer. This groundwater discharges to the Portneuf River along both the east and west side of the river and regionally.
Third bullet: remove limited to the area south of I-86 from this paragraph. Water from the EMF area discharges to the Portneuf River which flows north of I-86.
SOP 4- All purged water must be tested for total metals and meet the Shoshone-Bannock Tribes soil cleanup standards and other appropriate requirements prior to discharge on the ground.

Table 3-2 - The Tribes request total metals and radionuclides be analyzed for. The Tribes request this information prior to discharge of any water within the FMC OU. Pumping at a low flow may be more representative of actual groundwater conditions, at least for the initial first 10 minutes .prior to sampling.

We may have additional comments based on the referenced modeling document.
Thanks
Kelly